

**UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF FLORIDA
JACKSONVILLE DIVISION**

CASE NO. 3:19-cr-00001-TJC-PDB

UNITED STATES OF AMERICA,

v.

**JOHN R. NETTLETON,
Defendant.**

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MOTION TO CONTINUE TRIAL

Defendant JOHN R. NETTLETON, by and through undersigned counsel, files this Motion to Continue Trial and states:

1. Defendant is charged via indictment with two counts of obstruction of justice, one count of concealment of material facts, two counts of falsification of records, and five counts of giving false statements.
2. Defendant's initial appearance and arraignment was held on January 9, 2019.
3. This matter is currently set for trial beginning May 6, 2019. All pre-trial motions are due by April 15, 2019.
4. The Government's pre-indictment investigation spanned approximately four years.
5. From this investigation, the Government produced a very substantial amount of documentation.
6. In mid-January 2019, the Government provided Defendant with over 400,000 pages of discovery.
7. Certain portions of the discovery require the assistance of experts in order to adequately evaluate the Government's findings and conclusions.

8. Due to the vast amount of discovery in this case, the defense cannot possibly review all of these documents prior to the present trial date, draft necessary pre-trial motions, or adequately prepare for trial.
9. Defendant requests this trial be continued and reset to January 3, 2020. Such a continuance would allow Defendant sufficient time to review the immense amount of discovery in this case and prepare for trial.
10. On March 12, 2019, this Court held a status conference and discussed various scheduling matters with defense counsel and the Government. At the status conference, the Government expressed no objection to the trial in this matter being continued until January 3, 2020.
11. Under 18 U.S.C. § 3161(h)(7)(A), the ends of justice served by the requested continuance outweigh the best interest of the public and Defendant in a speedy trial.

WHEREFORE, Defendant requests for this Court to enter an order continuing the trial in this matter until January 3, 2020, and resetting the pre-trial deadlines accordingly.

Submitted on March 14, 2019, by

s/ Terence Lenamon
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CERTIFICATE OF SERVICE

I hereby certify that on March 14, 2019, a true and correct copy of the foregoing was electronically filed with the Clerk of the Court using CM/ECF, and thereby served on all interested parties.

s/ Terence Lenamon
Terence M. Lenamon